

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JACQUELINE MOEN-LEWIS,

Plaintiff,

and

CDC MANAGEMENT SERVICES, LLC.
and PAUL BOVA, single man,

Defendants.

NO. 3:11-cv-05413

STIPULATION AND ORDER CONTINUING
DEADLINE FOR MOTIONS RELATED TO
DISCOVERY RE: PRIVILEGE LOG AND
EMAIL COMMUNICATIONS OF PARKER

Come now the parties hereto and Stipulate to extend the deadline for motions relating to

discovery which is currently set for December 19, 2011 to January 30, 2012, PROVIDED THAT

the extension is strictly limited to motions relating to the Privilege Log currently being prepared

by the defendants and to the email communications of Deborah Parker which have not yet been

produced in readable format in response to plaintiff's most recent discovery requests. The

reason for the extension is that the case involves thousands of email communications, over 800

of which have been identified as subject to a claim of work product or of attorney-client

privilege. The defendants are currently revising the Privilege Log to provide sufficient

information on the Log so that the

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*Morton
McGoldrick*
A PROFESSIONAL SERVICE CORPORATION
ATTORNEYS AT LAW

820 "A" Street, Suite 600
P.O. Box 1533
Tacoma, Washington 98401
(253) 627-8131
Fax: (253) 272-4338

1 or other objection is properly taken. Given the volume of the information, the defendant has
2 been unable to complete the Privilege Log and produce it to Plaintiff's Counsel in a way that it
3 can be meaningfully reviewed, considered and evaluated prior to the deadline for discovery
4 motions set for next Monday, December 19th. Defendant will complete the Log and deliver it to
5 the plaintiff no later than December 30, 2011 so that motions relating to this Privilege Log (and
6 emails not yet produced for Deborah Parker) can be timely made by the new proposed deadline
7 of January 30, 2011.

8 Dated this 15th day of December, 2011
9

10 MORTON MCGOLDRICK, P.S.

GORDON EDMUNDS GRELISH, PLLC

11 /s/ Kathleen E. Pierce
12 Kathleen E. Pierce, WSBA No. 12631
13 Attorney for Plaintiff
14 820 "A" Street, Suite 600
15 Tacoma, WA 98402
16 (253) 627-8131
17 kepierce@bvmm.com

11 /s/ Randolph I. Gordon
12 Randolph I. Gordon WSBA No. 8435
13 Attorneys for Defendant
14 1218 3rd Ave. Ste. 1000
15 Seattle, WA 98101-3290
16 (425) 454-3133
17 rgordon@geg-law.com

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19 ORDER

20 This matter having come on for hearing upon the Stipulation of the parties and the Court
21 having reviewed the Stipulation and the records and files herein and being fully advised in the
22 premises it is hereby

23 ORDERED, ADJUDGED AND DECREED the deadline for motions relating to
discovery which is currently set for December 19, 2011 be and hereby is CONTINUED to

STIP & ORD RE: DISCOVERY

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1 January 30, 2012, PROVIDED THAT the extension is strictly limited to motions relating to the
2 Privilege Log currently being prepared by the defendants and to the email communications of
3 Deborah Parker which have not yet been produced in readable format in response to plaintiff's
4 most recent discovery requests.

5 DATED this 15th day of December, 2011.

6 
7

8 ROBERT J. BRYAN
United States District Judge
9

10
11 MORTON MCGOLDRICK, P.S.

GORDON EDMUNDS GRELISH, PLLC

12 /s/ Kathleen E. Pierce
13 Kathleen E. Pierce, WSBA No. 12631
14 Attorney for Plaintiff
15 820 "A" Street, Suite 600
16 Tacoma, WA 98402
17 (253) 627-8131
18 kepierce@bvmm.com

19 /s/ Randolph I. Gordon
20 Randolph I. Gordon WSBA No. 8435
21 Attorneys for Defendant
22 1218 3rd Ave. Ste. 1000
23 Seattle, WA 98101-3290
(425) 454-3133
rgordon@ geg-law.com

STIP & ORD RE: DISCOVERY

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